

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

JUDY JACK  
Debtor

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Case No. 07-32747-H4-13

Chapter 13

AMC MORTGAGE SERVICE, INC.  
Movant

vs.

JUDY JACK  
Respondent

**DEBTOR'S RESPONSE AND OBJECTION TO THE MOTION FOR  
RELIEF FROM AUTOMATIC STAY AND  
REQUEST FOR HEARING(Docket #9)**

Judy Jack (individually "Debtors"), respond and objects to the Motion for Relief from the Automatic Stay(Docket #9) ("Motion") filed by AMC Mortgage Service, Inc. ("Movant") with regard to the collateral or property described by Movant in the Motion (the "Property") and will show the court as follows:

**General Response:**

\_\_\_\_\_ Movant failed to utilize the proper form of motion. The motion should be denied.

**Specific Responses**

1. Debtor admits the allegations contained in paragraph: 1.
2. Debtor admits the allegations contained in paragraph: 2.
3. Debtor has insufficient information as to the owner and holder of the Note and therefore denies the allegations in paragraph: 3.
4. Debtor has insufficient information as to the sale of the Debtor's property and therefore denies the allegations contained in paragraph: 4.

5. Debtor denies the allegations contained in paragraph : 5.
6. There is not a paragraph 6.
7. Debtor denies the allegations contained in paragraph: 7.
8. Debtor denies the allegations contained in last paragraph.
9. The Property is necessary for a successful reorganization of the Debtor.
10. Debtor requests a hearing on the Motion.

WHEREFORE, Debtor respectfully request the court conduct a hearing on the Motion and after the hearing deny the Motion and grant them such other and further relief to which they are entitled.

Dated: May 15, 2007

Respectfully submitted,

/s/ Reese W. Baker  
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Houston, Texas 77007  
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ATTORNEY FOR THE DEBTOR

OF COUNSEL:

BAKER & ASSOCIATES, L.L.P.  
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Houston, Texas 77007  
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(713) 869-9100 Fax

**CERTIFICATE OF SERVICE**

A copy of the Debtor's Response and Objection to Movant's Motion for Relief from the Automatic Stay was delivered on or about May 15, 2007, to all parties listed below in the manner listed below:

Kerry M. Southerland  
3333 Lee Parkway, Eighth Floor  
Dallas, TX 75219  
Attorney for Movant

CM/ECF Electronic Delivery

David G. Peake  
9660 Hillcroft, #430  
Houston, TX 77096

CM/ECF Electronic Delivery

/s/ Reese W. Baker  
Reese W. Baker

**VERIFICATION OF TRANSMITTAL TO U.S. TRUSTEE**

The undersigned attorney, under penalty of perjury, hereby certifies that a copy of Debtor's Response and Objection to Movant's Motion for Relief from the Automatic Stay was delivered to the United States Trustee, 515 Rusk, Suite 3516, Houston, Texas, 77002, on or about May 15, 2007, by CM/ECF electronic delivery.

/s/ Reese W. Baker  
Reese W. Baker